

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA, NEWPORT NEWS DIVISION

VICTORIA RICHARDSON,)	
Plaintiff,)	
)	
v.)	
)	Civil Action No.: 4:12-cv-00025-RBS-FBS
WILLIAM SNEIDER AND)	
ASSOCIATES, LLC,)	
JANE ROE, AND JOHN DOE,)	
Defendants.)	
)	
)	

MOTION FOR DEFAULT JUDGMENT

COMES NOW your Plaintiff, VICTORIA RICHARDSON, by undersigned counsel, and moves this Honorable Court for a default judgment against Defendant, WILLIAM SNEIDER AND ASSOCIATES, LLC, pursuant to Rule 55 of the Rules of Civil Procedure, and in support of her Motion respectfully pleads as follows:

1. Plaintiff filed the instant suit on February 14, 2012, against Defendant for Plaintiff for its willful and substantial violations of the Fair Debt Collections Practices Act and Telephone Consumer Protection Act.
2. Pursuant to Rules 4(h)(1)(B) of the Rules of Civil Procedure and Section 13.1-1018 of the Code of Virginia, 1950, as amended, Plaintiff, through counsel, had Defendant served with her Complaint through the Clerk's Office of the State Corporation Commission on February 17, 2012.
3. A Certificate of Compliance was filed by the Clerk of the Commission on February 22, 2012.

4. To date, Defendant has not answered or appeared and is now in default pursuant to Rule 55 of the Rules of Civil Procedure.

WHEREFORE your Plaintiff, VICTORIA RICHARDSON, prays that this Honorable Court enter judgment against Defendant WILLIAM SNEIDER AND ASSOCIATES, LLC, in favor of Plaintiff for Defendant's violations of the Fair Debt Collections Practices Act, 15 U.S.C. 1592 et seq., for the maximum allowable statutory damages of \$1000, and treble damages for its violations of the Telephone Consumer Protection Act, 47 U.S.C. 277, et seq., in the amount of \$10,500, for each of its seven violations of that Act, award her costs and attorney's fees, and grant any other relief it deems fit.

Respectfully Submitted By:
VICTORIA RICHARDSON

/s/

Sarah Bland, Esquire
VSB No. 70813
Counsel for Plaintiff
Legal Aid Society of Eastern Virginia
30 West Queens Way
Hampton, VA 23669
(757) 275-0080 – telephone
(757) 275-0087 – facsimile
sarahb@laseva.org

CERTIFICATION

I hereby certify that on this 5th day of April, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, and I will mail a copy of the document by the U.S. mail to the non-NEF user:

WILLIAM SNEIDER AND ASSOCIATES, LLC
4500 HUGH HOWELL ROAD, STE. 559
TUCKER, GA 30084

/s/

Sarah Bland, Esquire
VSB No. 70813
Counsel for Plaintiff

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